

September 2, 2015

Via ECF

The Honorable Karen M. Williams United States District Court District of New Jersey Mitchell H. Cohen U.S. Courthouse One John F. Gerry Plaza, Room 2040 Camden, NJ 08101

Re: Barbagli v. Equifax Mortgage Services, LLC, No. 13-5897

Dear Judge Williams:

We represent Plaintiff in the above matter. The parties would like to inform the Court that they have agreed to conduct a mediation with The Honorable James R. Melinson (Ret.) through JAMS Mediators in Philadelphia, Pennsylvania on October 20, 2015.

The parties have agreed to complete any outstanding discovery, which is minimal, within 30 days after completion of the mediation should the parties be unable to reach a resolution. Accordingly, the parties respectfully request that the Court stay all discovery, motion and pretrial deadlines until the mediation is conducted to the extent the parties are unable to resolve the matter at mediation. The parties will report back to the Court on or before October 27, 2015 regarding the outcome of the mediation.

Should Your Honor have any concerns regarding the parties' request, both parties will stand ready to respond to the Court's questions. Thank you for Your Honor's consideration of Plaintiff's request.

Respectfully Submitted,

FRANCIS & MAILMAN, P.C.

GREGORY GORSKI

Cc: Debra M. Albanese (via ECF) Lewis Perling, Esquire (via email)